

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re
Corenia S Sirota

Case No 5:18-04426 RNO

Laeview Loan Servicing LLC
Movant

v

Corenia S Sirota
Jack N Zaharopoulos
Respondents

ANSWER OF DEBTOR TO STAY RELIEF MOTION OF MORTGAGEE

Corenia S Sirota (the "Debtor"), by Debtor's attorney, Robert Spielman, states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The Debtor is without sufficient information, despite reasonable investigation, to be able to form a belief as to accuracy of the allegation concerning the assignment history of the mortgage in question, and proof of the assignment history is demanded at trial.
5. Admitted.
6. Admitted. In further answer, the arrearage will be cured within a reasonable amount of time. In further answer, the Debtor has suffered financial harm as a result of the Covid pandemic, appears to be entitled to relief under the CARES Act, and has or will apply for assistance from the Movant.
7. Admitted. In further answer, the arrearage will be cured within a reasonable amount of time. In further answer, the Debtor has suffered financial harm as a result of the Covid pandemic, appears to be entitled to relief under the CARES Act, and has or will apply for assistance from the Movant.
8. Denied. The arrearage will be cured within a reasonable amount of time. Further, the Debtor has suffered financial harm as a result of the Covid pandemic, appears to be entitled to relief under the CARES Act, and has or will apply for assistance from the

Movant.

9. No Answer required.

WHEREFORE, the Debtor requests that the Motion be dismissed; and that the Court grant such other relief as is just.

LAW OFFICES OF ROBERT SPIELMAN, P.C.

BY: /s/ Robert Spielman

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Bloomsburg, Pennsylvania

Dated: April 27, 2023

CERTIFICATION OF SERVICE

I, Robert Spielman, 29 East Main Street, Bloomsburg, PA 17815-1485 certify: that I am, and at all times hereinafter mentioned was, more than 18 years of age; and that on the date set forth below, I served a copy of the annexed Answer on:

Jack N Zaharopoulos
8125 Adams Dr Ste A
Hummelstown PA 17036

Denise Carlon, Esquire
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701 Market Street, Suite 5000
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Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant

by first class mail, postage prepaid, addressed as set forth above, or by electronic transmission. I certify under penalty of perjury that the foregoing is true and correct.

LAW OFFICES OF ROBERT SPIELMAN, P.C.

BY: /s/ Robert Spielman

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